Mr. Mike Talaga GenCorp, Inc., dba GDX Automotive P. O. Box 507 Wabash, IN 46992

Dear Mr. Talaga:

Re: 169-16057

First Administrative Amendment to Part 70 169-5650-00004

GenCorp, Inc., dba GDX Automotive, was issued a Part 70 on April 15, 2002, for a stationary rubber product manufacturing plant located at One General Street, Wabash, Indiana 46992. A letter requesting permit changes was received on May 17, 2002. The changes related to emissions calculations in the Addendum to the Technical Support Document (TSD) to the Part 70 permit. The error in the calculations is being noted in this administrative amendment. In addition, the source requested the correction of a typographical error in the monitoring condition in the permit, to alter a reference from Line 3 booth to line 4 booth. 326 IAC 2-7-11(a)(1) states that an administrative amendment can be used for a change that "corrects typographical errors". Also, 326 IAC 2- 7-11(a)(7) states that an administrative amendment may be used for a modification that "makes a change to a monitoring, maintenance, or record keeping requirements that is not environmentally significant". The correction requested meets these requirements, therefore, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (strike-out to show deletions and **bold** to show additions):

(1) The condition D.2.9 is changed as follows:

D.2.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, one (1) Line 3 Line 4 topcoat spray booth, and one (1) below belt spray coating booth, identified as U152) stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

GenCorp, Inc., dba GDX Automotive Wabash, Indiana

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This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments

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cc: File - Wabash County

U.S. EPA, Region V

Wabash County Health Department

Air Compliance Section Inspector - Ryan Hillman

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

GenCorp, Inc., dba GDX Automotive One General Street Wabash, Indiana 46992

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T169-5650-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 15, 2002

First Administrative Amendment No.: 169-16057	Pages Modified: 33
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

- (b) Construction Permit (169-4072-00004), issued on February 13, 1995, Condition 5, listing requirements pursuant to 326 IAC 2-3;
- (c) Amendment (169-11456-00004), issued on November 4, 1999 and the new operation condition #5 of [CP 169-4072-00004], listing requirements pursuant to 326 IAC 2-2 and 40 CFR 52.21;

are not applicable because IDEM, OAQ has determined that, based on the latest USEPA approved emission factors listed in AP-42 for the operations associated with the source, the potential to emit VOC from the source is less than 250 tons per year and is a PSD minor source. Therefore, these conditions are not required for the source to be a minor PSD source.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) and Hazard Air Pollutants (HAPs)

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.2.1 and D.2.3(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC and HAPs Emissions

Compliance with Conditions D.2.1 and D.2.3(a) and (b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage at each facility for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, one (1) Line 4 topcoat spray booth, and one (1) below belt spray coating booth, identified as U152), at all times that the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the one (1) HVLP coating operation for Finishing Area 239, Extrusion Line 2 HVLP spray booths, one (1) Line 4 topcoat spray booth, one (1) HVLP coating operation for Finishing Area 239, and one (1) below belt spray coating booth, identified as U152), are in operation.

D.2.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, one (1) Line 4 topcoat spray booth, and one (1) below belt spray coating booth, identified as U152) stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.